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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re TREMONT SECURITIES LAW, STATE
LAW AND INSURANCE LITIGATION

Master Docket No. 08 Civ. 11117 (TPG)

This document relates to:
THE INSURANCE ACTION, 09 Civ. 557
(TPG), specifically to:

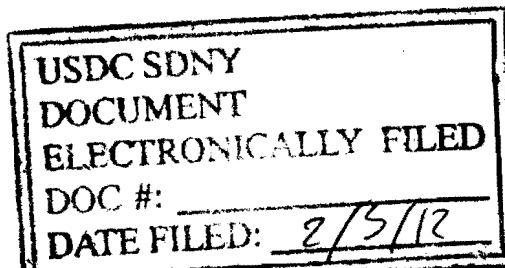
THE INTERNATIONAL DAD TRUST,

Plaintiff,

-against-

TREMONT OPPORTUNITY FUND III, L.P.,
et al.,

Defendants.



11 Civ. 1687 (TPG)

**STIPULATION AND [PROPOSED] ORDER EXTENDING THE SCHEDULE
FOR BRIEFING OF DEFENDANTS' ANTICIPATED MOTIONS TO DISMISS**

WHEREAS, on August 19, 2011, this Court approved a partial settlement in *In re Tremont Securities Law, State Law and Insurance Litigation*, No. 08-Civ-11117 (TPG) (S.D.N.Y. 2009);

WHEREAS, on October 20, 2011, the Court held a status conference to determine how several cases that remain pending in the above-referenced litigation should proceed;

WHEREAS, on November 14, 2011, the Court entered an Order that, among other things, provided as follows: (i) Plaintiffs shall determine whether they wish to file amended or consolidated complaints in their respective actions, and if they elect to do so, their amended or consolidated complaints shall be filed by December 19, 2011; (ii) Defendants shall file motions to dismiss or answers to the complaints in each action by January 31, 2012; (iii) Plaintiffs shall

file opposition papers to the motions by February 29, 2012; and (iv) Defendants shall file replies by March 20, 2012;

WHEREAS, Plaintiff The International DAD Trust ("International DAD") filed its Amended Complaint on December 19, 2011;

WHEREAS, Defendants seek a two-week extension of the schedule for the briefing on Defendants' anticipated motion to dismiss;

WHEREAS, Plaintiff does not oppose Defendants' request; and

WHEREAS, Defendants have made no prior requests to extend the schedule for the briefing on Defendants' anticipated motion to dismiss;

IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties, without waiving any rights, defenses, or arguments they may assert, except as set forth below, and subject to the approval of the Court, as follows:

1. Defendants shall file their response to Plaintiff International DAD's Complaint by February 14, 2012;

2. Should Defendants, or any of them, move to dismiss the Amended Complaint, Plaintiff International DAD shall file its opposition to Defendants' motions to dismiss thirty (30) days after Defendants' motion to dismiss is filed; and

3. Defendants shall file any reply briefs twenty (20) days after the filing of Plaintiff International DAD's opposition.

01-27-12:04:55PM;

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January __, 2012

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[954539-1]

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January 27, 2012

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SO ORDERED:

 2/3/12

Hon Thomas P. Greisa, United States District Judge

